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Attorney for Defendant
CARRIE MARIE SULAK

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
CARRIE MARIE SULAK,)
)
Defendant.)
)
_____)

Case No. CR.S-04-218-MCE

STIPULATION AND ~~{PROPOSED}~~ ORDER

DATE: July 26, 2005

TIME: 8:30 a.m.

JUDGE: Hon. Morrison C. England, Jr.

It is hereby stipulated and agreed to between the United States of America through PHIL FERRARI, Assistant U.S. Attorney, and defendant, CARRIE MARIE SULAK, by and through her counsel, RACHELLE BARBOUR, Assistant Federal Defender, that the status conference of June 7, 2005 at 8:30 a.m. be vacated and that a further status conference be set for July 26, 2005 at 8:30 a.m.

This continuance is being requested because parties are negotiating a plea agreement and need time to reduce it to writing and provide it to the Court. Defense counsel needs time to discuss the plea with the prosecutor and with Ms. Sulak. Further, defense counsel will be going on maternity leave in June, and Supervising Assistant

Federal Defender, Dennis S. Waks will be taking over this case and needs more time to review the file and familiarize himself with this case.

Speedy trial time is to be excluded from the date of this order through the date of the status conference set for July 26, 2005, pursuant to 18 U.S.C. §§ 3161 (h) (8) (B) (iv) [reasonable time to prepare] (Local Code T4).

DATED: June 9, 2005.

Respectfully submitted,

QUIN DENVIR
Federal Defender

/s/ Rachelle Barbour

RACHELLE BARBOUR
Assistant Federal Defender
Attorney for Defendant
CARRIE MARIE SULAK

McGREGOR W. SCOTT
United States Attorney

/s/ Rachelle Barbour for Phil Ferrari

DATED: June 9, 2005.

PHIL FERRARI
Assistant U.S. Attorney

O R D E R

IT IS SO ORDERED.

DATED: June 7, 2005.



MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE